

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

This Document Relates to:  
  
ALL CASES

**TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs hereby move the Court to consider whether certain materials marked confidential by Uber should be sealed.

Pursuant to Pretrial Order No. 8, the parties are filing a letter brief detailing their dispute regarding the production of discovery related to safety data and statistics that Plaintiffs seek from Uber. The letter brief refers to information and data which Uber designated as confidential.

**Material To Be Filed Under Seal**

The materials to be filed under seal are a portion of the parties' letter brief and corresponding exhibits. The parties in those matters, including Uber, designated them as confidential. Thus, Plaintiffs request the Court consider whether the following should be filed under seal:

Document	Description	Designating Party
The Parties' Letter Brief re: the production of safety data and statistics	Portions of briefing referring to documents the Parties filed under seal	Uber

Exhibit [C] to the Parties' Letter Brief	A document produced by Uber in this litigation	Uber
Exhibit [D ] to the Parties' Letter Brief	The declaration of Katherine MacDonald filed under seal in Case No. CJ-21-005188.	Uber
Exhibit [G ] to the Parties' Letter Brief	The declaration of Randall Luskey filed under seal in Case No. CJ-21-005188.	Uber

Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules. None of the information at issue was marked confidential by Plaintiffs.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Roopal P. Luhana in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: June 5, 2024

Respectfully submitted,

By: /s/ Roopal P. Luhana

Roopal P. Luhana

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 5, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

Dated: June 5, 2024

By: /s/Roopal P. Luhana

Roopal P. Luhana